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**From:** Eric Smith [ESmith@ramboll.com]  
**Sent:** 8/30/2019 8:45:56 PM  
**To:** Mehta, Sandeep [mehta.sandeep@epa.gov]  
**CC:** Hylton Jackson [hylton.jackson@dnr.iowa.gov]; Danielle Schreiber [dschreiber@verdantlaw.com]; Scott Heemstra [Scott.Heemstra@diamondvogel.com]; Keith Delange [KDelange@geotekeng.com]  
**Subject:** Vogel - Maurice Iowa Site  
**Attachments:** UIC Notification.pdf

Sandeep

On July 9, 2019, Vogel's attorney, Danielle Schreiber, sent you a letter regarding the groundwater point of compliance for the Site. Ms. Schreiber indicated that Vogel was questioning whether to move forward with the Pilot Study Work Plan (PSWP) because changing the groundwater point of compliance significantly changes the goals and scope of the PSWP (and is inconsistent with the Administrative Record). On July 15, 2019, IDNR sent a letter to EPA concurring with Ms. Schreiber's letter, stating that it did not agree with changing the groundwater point of compliance. On August 12, 2019, Scott Heemstra from Vogel asked for a status update from EPA regarding the groundwater point of compliance. Vogel has not heard anything from EPA to date regarding the groundwater point of compliance issue.

As you know, Vogel is committed to cleaning up the Site. Vogel submitted a comprehensive and aggressive bioremediation PSWP to be implemented throughout the Site, which includes a Plume-Stop barrier to prevent future off-site migration of contamination. Vogel's goal after implementation of the PSWP is to get the site delisted from the NPL.

Despite not hearing from EPA regarding changing the groundwater point of compliance, Vogel has decided to move forward with implementing the PSWP with the ultimate goal of cleaning the site to the current point of compliance. If Vogel waits any longer for EPA's response, it will likely not be able to begin implementation before May of 2020. Vogel still believes that changing the groundwater point of compliance is not warranted. By moving forward, Vogel is by no means agreeing or accepting EPA's proposed position to change the groundwater point of compliance.

As part of moving forward with implementation of the approved PSWP and North Area Work Plan I wanted to notify you of the following activities that Ramboll will be conducting on behalf of Vogel:

- Installation the four groundwater monitoring wells as part of the additional north area characterization September 11 – 12 (13) and collecting the surface water samples from the unnamed creek as detailed in the north area work plan.
- Submitting today via email the required request for rule by authorization from the Underground Injection Control (UIC) Program USEPA Region 7 Iowa Program Coordinator. I have attached this document for your records.
- Submitting early next week the Design Plan Addendum to the PSWP.
- Conducting three soil borings, September 10 (11) in the area of the PlumeStop injection as part of the design verification testing (DVT) to verify the thickness and other injection parameters for the installation of the PlumeStop barrier.
- October 8 – estimated November 23, conduct injection of the slow release oxygen compound (EOx) and nutrient (diammonium phosphate, DAP) mixture in to the areas defined in the PSWP.
- Sometime during the same period (dates will be finalized following completion of the DVT) installation of the PlumeStop Barrier (estimated to take 6 – 9 days).

Sincerely,

**Eric Smith, PG, CHG**

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